

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

FILED
2/15/2024 KG
THOMAS G. BRUTON
K. D. DISTRICT COURT

Shukeitha Jackson

Plaintiff

v.

AbbVie

Defendant

Case Number: 23-CV-3747**Judge:** Rowland**Magistrate Judge:** Cummings

PLAINTIFF'S RESPONSE TO DEFENDANT ABBVIE'S MOTION TO DISMISS

Now comes Plaintiff Shukeitha Jackson, Pro Se. respectful submit her **RESPONSE TO DEFENDANT ABBVIE'S MOTION TO DISMISS**, states as follows:

1. Plaintiff Jackson exhausted her administrative remedies resulting in a issuing of a right -to -sue issued on June 10, 2023 for her charge of discrimination with the Illinois Department of Human Rights (' IDHR") and the U.S . Equal Employment Opportunity Commission (" EEOC") against AbbVie — IDHR Charge 2019CF0386 / EEOC Charge No. 21BA81906. These charges were filed for racial discrimination, racial harassment, racial retaliation and wrongful discharge of employment for complaining of about discrimination.

2. On or about June 13, 2023, Plaintiff Jackson filed a COMPLAINT OF EMPLOYMENT DISCRIMINATION Title VII of the Civil Rights Act of 1964 and 42 U.S.C. § 1981 based on Race, Color and RETAILATION against AbbVie, before 90 days of receiving her right -to- sue letter issued by Equal Employment Opportunity Commission dated June 10, 2023.

3. Plaintiff's Title VII of the Civil Rights Act of 1964 and 42 U.S.C. § 1981 claims are not outdated - barred, but PROTECTED whereas the four -year statute of limitation begins after exhaustion of administrative Remedies. See Johnson v. Rivera 42 U.S.C. § 1983 & 42 U.S.C. § 1997e(a) (2000).

WHEREFORE, for all of the reasons set forth and good cause exits. I ask that my valid COMPLAINT not be DISMISSED for AbbVie's claims are invalid.

Respectfully,

 

(Plaintiff's Signature)

(Date)

Shuketha Jackson
523 Helmholtz Ave.
Waukegan, IL. 60085
(224) 469-5302

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]